

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §
KING, MICHAEL DENTON, FRED WALLACE, §
and MARVIN RAY YATES, individually and on §
behalf of those similarly situated, §

Plaintiffs, §

v. §

BRYAN COLLIER, in his official capacity, §
ROBERTO HERRERA, in his official capacity, and §
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants. §

CIVIL ACTION NO.
4:14-cv-1698

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 4

Declaration of C. Brown

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Declaration of Charles Brown

DECLARATION OF CHARLES RAY BROWN

1. My name is CHARLES RAY BROWN.

2. My date of birth is 9/2/1970.

3. My TDCJ number is # 2123961.

~~4. I have been an inmate in the Texas Department of Criminal Justice (TDCJ)'s Wallace Pack Unit in Grimes County, Texas since~~

5. I am assigned to the Stiles Unit at E 23 Cell.

6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

° I WAS ASSIGNED TO A CELL IN THE STILES UNIT
ON JULY 11, 2019

° As of today, JULY 18, 2019, MY CELL HAS NOT
BEEN AIR-CONDITIONED SINCE I ARRIVED AT STILES.

° WHILE AT STILES, I HAVE NOT BEEN PERMITTED TO
~~STAY~~ SPEND TIME IN AN AIR CONDITIONED ROOM
(EXCEPT DURING AN ATTORNEY VISIT).

Charles R. Brown

CHARLES RAY BROWN

° WHILE AT STILES, I HAVE NOT BEEN PERMITTED

TO TAKE A COLD SHOWER.

° I SWEAT EVERY DAY IN MY CELL

° I HAVE TYPE II DIABETES

Charles R. Brown

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature: Charles R. Brown Dated: 7-18-19

Printed Name: CHARLES RAY BROWN